

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

JAMES EVERETT SHELTON	:	
Plaintiff	:	Civil Action NO. 18-cv-2072-TJS
	:	
v.	:	
	:	
Paramount Holding Company, LLC	:	
Defendant	:	
	:	<i>Electronically Filed</i>

**Defendant's Initial Disclosures**

Counsel for the defendant and the plaintiff were to hold a conference pursuant the Federal Rules of Civil Procedure at 10:00 am on June 18, 2018; the plaintiff had agreed but failed to call defendant's counsel. The defendant, nevertheless, submits the following initial disclosures:

1. Names, addresses and telephone numbers of all individuals likely to have discoverable information and the subjects of that information
  - a. Jared McDaniel, official of the Defendant. He is knowledgeable as to the subjects set forth in the Answer. He may be contacted through his counsel.
  - b. Tanvir Alam, DTX Business Solutions House # 855, Road # 13, Adabar, Mohammadpur, Dhaka 1207, Bangladesh, Phone # +8801973054632, He is knowledgeable as to the subjects set forth in the Answer
  - c. The Plaintiff, its staff and officers may be contacted through defendant's counsel.

2. A description by category and location of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment;
  - a. Emails between the parties.
  - b. Correspondence from Tanvir Alam, DTX Business Solutions.
  - c. Recordings of telephone conversation between the plaintiff and representative(s) of the defendant.
  - d. Telephone records of the defendant.
  - e. Ring central records.
3. A computation of each category of damages claimed by the disclosing party — who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered;
  - a. There are no damages.
  - b. Defendant knows of no insurance agreements that will satisfy any of the Plaintiff's claims.

Respectfully submitted,

By:     /s/ Richard N Lipow      
Richard N. Lipow, Esq.  
Attorney at Law  
629 Swedesford Road  
Malvern, PA 19355-1032  
Telephone: (610) 251-2500  
Facsimile: (610) 889-9564

Attorney for Defendant

Dated: 6/18/18

CERTIFICATE OF SERVICE

I certify that on June 18, 2018 I served the foregoing Initial Disclosure Statement on the plaintiff by first class mail.

Respectfully submitted,

By:     /s/ Richard N Lipow      
Richard N. Lipow, Esq.  
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629 Swedesford Road  
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Attorney for Defendant

Dated: June 18, 2018